

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

ROYCE SOLOMON, et al., individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

AMERICAN WEB LOAN, INC., et al.,

Defendants.

Civil Action No. 4:17-cv-0145 HCM-RJK

CLASS ACTION

**DECLARATION OF STEPHEN RYAN, JR. IN FURTHER SUPPORT OF
PLAINTIFFS' SUPPLEMENTAL MEMORANDUM OF LAW IN OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS
FOR LACK OF SUBJECT MATTER JURISDICTION**

I, Stephen Ryan, Jr., declare as follows:

1. I am an attorney at the law firm of Berman Tabacco, One Liberty Square, Boston, MA 02109. I am admitted *pro hac vice* in this action (ECF No. 208) and serve as co-counsel for Plaintiffs and the putative class.
2. I submit this Declaration for the purpose of identifying documents filed in support of Plaintiffs' Supplemental Memorandum of Law in opposition to (1) AWL, Inc., American Web Loan Inc., and MacFarlane Group, Inc.'s Motion to Dismiss Pursuant to Rule 12(b)(1) for Lack of Subject Matter Jurisdiction (ECF No. 72, 73); (2) Defendant SOL Partners' Motion and Memorandum in Support of Motion to Dismiss Plaintiffs' Complaint for Lack of Subject Matter Jurisdiction (ECF No. 86); and (3) Defendant Mark Curry's Motion and Memorandum in Support of Motion to Dismiss Plaintiffs' Complaint for Lack of Subject Matter Jurisdiction or, Alternatively, Failure to State a Claim (ECF No. 85).
3. Attached as Exhibit 1 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
4. Attached as Exhibit 2 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
5. Attached as Exhibit 3 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]

6. Attached as Exhibit 4 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
7. Attached as Exhibit 5 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
8. Attached as Exhibit 6 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
9. Attached as Exhibit 7 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
10. Attached as Exhibit 8 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
11. Attached as Exhibit 9 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
12. Attached as Exhibit 10 is a true and correct copy of a document [REDACTED]
[REDACTED]
[REDACTED]

13. Attached as Exhibit 11 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
14. Attached as Exhibit 12 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
15. Attached as Exhibit 13 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
16. Attached as Exhibit 14 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
17. Attached as Exhibit 15 is a true and correct copy of the Spring 2011 Volume 3, Number I Otoe-Missouria Tribal Newsletter, obtained from the Otoe-Missouria's website, at http://www.omtribe.org/useruploads/files/otoe_spring_2011-for_web.pdf.
18. Attached as Exhibit 16 is a true and correct copy of a print out from the Trademark Electronic Search System, available at <http://tmsearch.uspto.gov/> and accessed on November 7, 2018.
19. Attached as Exhibit 17 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
[REDACTED]

20. Attached as Exhibit 18 is a true and correct copy of a document entitled American Web Loan, Inc. Trademark Assignment Cover Sheet and Assignment for Trademarks between American Web Loan Holdings, LLC and American Web Loan, Inc., dated April 26, 2016.
21. Attached as Exhibit 19 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
22. Attached as Exhibit 20 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
23. Attached as Exhibit 21 is a true and correct copy of an email produced in this case [REDACTED]
[REDACTED]
24. Attached as Exhibit 22 is a true and correct copy of an email produced in this case [REDACTED]
[REDACTED]
[REDACTED]
25. Attached as Exhibit 23 is a true and correct copy of [REDACTED]
[REDACTED]
26. Attached as Exhibit 24 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
[REDACTED]
27. Attached as Exhibit 25 is a true and correct copy of an email produced in this case [REDACTED]
[REDACTED]

28. Attached as Exhibit 26 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
29. Attached as Exhibit 27 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED].
30. Attached as Exhibit 28 is a true and correct copy of an email produced in this case from [REDACTED]
31. Attached as Exhibit 29 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
[REDACTED]
32. Attached as Exhibit 30 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
33. Attached as Exhibit 31 is a true and correct copy of an email produced in this case from [REDACTED]
34. Attached as Exhibit 32 is a true and correct copy of a document produced in this case entitled [REDACTED]
35. Attached as Exhibit 33 is a true and correct copy of an email produced in this case from [REDACTED]
36. Attached as Exhibit 34 is a true and correct copy of a presentation produced in this case entitled [REDACTED]

37. Attached as Exhibit 35 is a true and correct copy of a document produced in this case entitled [REDACTED]

38. Attached as Exhibit 36 is a true and correct copy of an email produced in this case from [REDACTED]

39. Attached as Exhibit 37 is a true and correct copy of an email produced in this case from [REDACTED]

40. Attached as Exhibit 38 is a true and correct copy of an email produced in this case from [REDACTED]

41. Attached as Exhibit 39 is a true and correct copy of an email produced in this case from [REDACTED]

42. Attached as Exhibit 40 is a true and correct copy of an email produced in this case from [REDACTED]

43. Attached as Exhibit 41 is a true and correct copy of an email produced in this case from [REDACTED]

44. Attached as Exhibit 42 is a true and correct copy of a document produced in this case [REDACTED]

45. Attached as Exhibit 43 is a true and correct copy of an email produced in this case from [REDACTED]

46. Attached as Exhibit 44 is a true and correct copy of an email produced in this case from [REDACTED]

47. Attached as Exhibit 45 is a true and correct copy of an email produced in this case from

[REDACTED]

48. Attached as Exhibit 46 is a true and correct copy of an email produced in this case from

[REDACTED]

[REDACTED]

49. Attached as Exhibit 47 is a true and correct copy of an email produced in this case from

[REDACTED]

50. Attached as Exhibit 48 is a true and correct copy of an email produced in this case from

[REDACTED]

51. Attached as Exhibit 49 is a true and correct copy of an email produced in this case from

[REDACTED]

52. Attached as Exhibit 50 is a true and correct copy of a document produced in this case
entitled [REDACTED]

53. Attached as Exhibit 51 is a true and correct copy of an email produced in this case from

[REDACTED]

54. Attached as Exhibit 52 is a true and correct copy of an email produced in this case from

[REDACTED]

55. Attached as Exhibit 53 is a true and correct copy of an email produced in this case from

[REDACTED]

56. Attached as Exhibit 54 is a true and correct copy of an email produced in this case from

[REDACTED]

57. Attached as Exhibit 55 is a true and correct copy of a document produced in this case
entitled [REDACTED]

58. Attached as Exhibit 56 is a true and correct copy of an email produced in this case from

[REDACTED]

[REDACTED]

59. Attached as Exhibit 57 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

60. Attached as Exhibit 58 is a true and correct copy of a letter produced in this case from

[REDACTED]

61. Attached as Exhibit 59 is a true and correct copy of an email produced in this case from

[REDACTED]

62. Attached as Exhibit 60 is a true and correct copy of an email produced in this case from

[REDACTED]

63. Attached as Exhibit 61 is a true and correct copy of a document produced in this case that

[REDACTED]

[REDACTED]

64. Attached as Exhibit 62 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

65. Attached as Exhibit 63 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

66. Attached as Exhibit 64 is a true and correct copy of an email produced in this case from

[REDACTED]

67. Attached as Exhibit 65 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
68. Attached as Exhibit 66 is a true and correct copy of a Memorandum in Support of Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(1) by Defendants AWL, Inc.; American Web Loan, Inc. and Red Stone, Inc. filed in *Hengle v. Curry et al.*, 3:18-cv-00100-REP (E.D.Va April 18, 2018) (E-AWL-RS-20019589-9849).
69. Attached as Exhibit 67 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
70. Attached as Exhibit 68 is a true and correct copy of [REDACTED]
[REDACTED]
[REDACTED]
71. Attached as Exhibit 69 is a true and correct copy of an email produced in this case from [REDACTED]
72. Attached as Exhibit 70 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
73. Attached as Exhibit 71 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED].

74. Attached as Exhibit 72 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

75. Attached as Exhibit 73 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

76. Attached as Exhibit 74 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

77. Attached as Exhibit 75 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

78. Attached as Exhibit 76 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

79. Attached as Exhibit 77 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

[REDACTED]

80. Attached as Exhibit 78 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

81. Attached as Exhibit 79 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
82. Attached as Exhibit 80 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
83. Attached as Exhibit 81 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
[REDACTED]
84. Attached as Exhibit 82 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
85. Attached as Exhibit 83 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
86. Attached as Exhibit 84 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
87. Attached as Exhibit 85 is a true and correct copy of an email produced in this case from [REDACTED]
88. Attached as Exhibit 86 is a true and correct copy of a document produced in this case entitled [REDACTED]

89. Attached as Exhibit 87 is a true and correct copy of an email produced in this case from

[REDACTED]

90. Attached as Exhibit 88 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

91. Attached as Exhibit 89 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

92. Attached as Exhibit 90 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

93. Attached as Exhibit 91 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

94. Attached as Exhibit 92 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

95. Attached as Exhibit 93 is a true and correct copy of an email produced in this case from

[REDACTED]

96. Attached as Exhibit 94 is a true and correct copy of an email produced in this case from

[REDACTED]

97. Attached as Exhibit 95 is a true and correct copy of an email produced in this case from

[REDACTED]

98. Attached as Exhibit 96 is a true and correct copy of an email produced in this case from [REDACTED]
99. Attached as Exhibit 97 is a true and correct copy of a Otoe-Missouria Development Authority, Inc. certificate of incorporation dated August 7, 1986.
100. Attached as Exhibit 98 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
101. Attached as Exhibit 99 is a true and correct copy of a document produced in this case entitled [REDACTED]
102. Attached as Exhibit 100 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
103. Attached as Exhibit 101 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
104. Attached as Exhibit 102 is a true and correct copy of an email produced in this case from [REDACTED]
105. Attached as Exhibit 103 is a true and correct copy of an email produced in this case from [REDACTED]
[REDACTED]
106. Attached as Exhibit 104 is a true and correct copy of an email produced in this case from [REDACTED]

107. Attached as Exhibit 105 is a true and correct copy of a document entitled

[REDACTED]

108. Attached as Exhibit 106 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

109. Attached as Exhibit 107 is a true and correct copy of a document produced in this case entitled [REDACTED]

[REDACTED]

110. Attached as Exhibit 108 is a true and correct copy of an email produced in this case from [REDACTED]

[REDACTED]

111. Attached as Exhibit 109 is a true and correct copy of an email produced in this case from [REDACTED]

112. Attached as Exhibit 110 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

113. Attached as Exhibit 111 is a true and correct copy of [REDACTED]

[REDACTED]

[REDACTED]

114. Attached as Exhibit 112 is a true and correct copy of an email produced in this case from [REDACTED]

[REDACTED]

115. Attached as Exhibit 113 is a true and correct copy of [REDACTED]
[REDACTED]
116. Attached as Exhibit 114 is a true and correct copy of an email produced in this case
from [REDACTED]
[REDACTED]
117. Attached as Exhibit 115 is a true and correct copy of an email produced in this case
from [REDACTED]
118. Attached as Exhibit 116 is a true and correct copy of a letter produced in this case from
[REDACTED]
119. Attached as Exhibit 117 is a true and correct copy of a document produced in this case
entitled [REDACTED]
120. Attached as Exhibit 118 is a true and correct copy of a document produced in this case
entitled [REDACTED]
[REDACTED]
121. Attached as Exhibit 119 is a true and correct copy of an email produced in this case
from [REDACTED]
122. Attached as Exhibit 120 is a true and correct copy of an email produced in this case
from [REDACTED]
[REDACTED]
123. Attached as Exhibit 121 is a true and correct copy of a document produced in this case
entitled [REDACTED]
[REDACTED]

124. Attached as Exhibit 122 is a true and correct copy of a document produced in this case entitled [REDACTED]

125. Attached as Exhibit 123 is a true and correct copy of a document produced in this case entitled [REDACTED]

126. Attached as Exhibit 124 is a true and correct copy of [REDACTED]

127. Attached as Exhibit 125 is a true and correct copy of a document produced in this case

128. Attached as Exhibit 126 is a true and correct copy of a document produced in this case

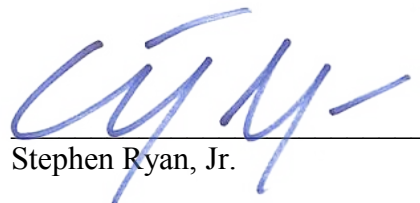
129. Attached as Exhibit 127 is a true and correct copy of a document produced in this case

130. Attached as Exhibit 128 is a true and correct copy of a document produced in this case entitled [REDACTED]

131. Attached as Exhibit 129 is a true and correct copy of a document produced in this case entitled [REDACTED]

132. Attached as Exhibit 130 is a true and correct copy of an email produced in this case from [REDACTED]
133. Attached as Exhibit 131 is a true and correct copy of an email produced in this case from [REDACTED]
[REDACTED]
134. Attached as Exhibit 132 is a true and correct copy of a letter with attachment produced in this case from [REDACTED]
[REDACTED]
135. Attached as Exhibit 133 is a true and correct copy of a document produced in this case entitled [REDACTED]
[REDACTED]
136. Attached as Exhibit 134 is a true and accurate copy of a document produced in this case entitled [REDACTED]
[REDACTED]
137. Attached as Exhibit 135 is a true and accurate copy of an email produced in this case from [REDACTED]
138. Attached as Exhibit 136 is a true and accurate copy of an email produced in this case from [REDACTED]
[REDACTED]
139. Attached as Exhibit 137 is a true and accurate copy of a document produced in this case entitled [REDACTED]

Executed this 20th day of November 2018.
Boston, Massachusetts


Stephen Ryan, Jr.